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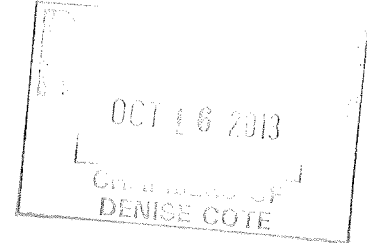
UNITED STATES
DISTRICT COURT
ELECTRONICALLY

10/16/2013

October 15, 2013

By Hand Delivery

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312



MEMO ENDORSED

Re: *Eastman Kodak Company v. Ricoh Company, Ltd.*, No. 12-cv-3109 (DLC)

Dear Judge Cote:

On behalf of Defendant Ricoh Company, Ltd. ("Ricoh"), we respectfully submit this letter pursuant to Paragraph 4(A) of the Court's Individual Practices, to seek permission to publicly file five redacted exhibits, in support of Ricoh's Motions *in Limine* (see Dkt. No. 145). Ricoh also requests permission to publicly file a redacted version of its Memorandum in Support of its Motions *in Limine*.

On October 9, 2013, Ricoh submitted an initial request for permission to redact these documents. Ricoh has since been advised of the Court's ruling that, at sections C.1-C.3 of Tab 3, Exhibit 17 (at pages 28-30, and the first line of page 31) only redactions to third-party company names are permitted. Accordingly, Ricoh submits this revised request seeking permission to file Tab 3, Exhibit 17 with redactions limited to those third-party company names only. A revised Tab 3, Exhibit 17 is submitted herewith. Per the Court's instructions, the other documents that Ricoh had previously requested permission to redact are also listed below.

The full set of Ricoh's Motions *in Limine* and accompanying papers, including unredacted exhibits, was served on Kodak by email on October 7, 2013.

I. Ricoh Seeks to Publicly File Five Exhibits and its Memorandum in Support of its Motions *in Limine* with the Confidential and Highly Confidential Information of Ricoh and Kodak Redacted

Ricoh seeks permission to publicly file the following redacted exhibits, which contain Confidential or Highly Confidential information of Ricoh and Kodak:

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LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | LONDON | TOKYO | MANNHEIM | MOSCOW | HAMBURG | PARIS

- Exhibit 17, the Expert Report and Disclosure of Vincent Thomas, dated May 17, 2013 [TAB 3].
- Exhibit 18, a financial spreadsheet produced at HOYA00000001 [TAB 5].
- Exhibit 19, the Second Supplement to the Expert Report and Disclosure of Vincent Thomas, dated September 16, 2013 [TAB 7].
- Exhibit 20, Kodak's Response to Ricoh's Second Set of Interrogatories, dated April 11, 2013 [TAB 9].
- Exhibit 21, Kodak's Response to Ricoh's Third Set of Interrogatories, dated April 26, 2013 [TAB 11].

The above exhibits contain sensitive business information that is not made public, and that Ricoh makes efforts to maintain as confidential. Were such information to be made public, it could be used to Ricoh's competitive and business disadvantage. To protect this confidential information, Ricoh respectfully requests that the Court allow it to file redacted versions of these exhibits. Ricoh has made efforts to redact the minimum necessary to protect its business sensitive information. On October 9, 2013, Kodak provided Ricoh with additional redactions to these exhibits that it asserts cover Kodak Confidential or Highly Confidential information. Clean copies of the redacted pages of the above exhibits are enclosed at TABS 4, 6, 8, 10, and 12 respectively.

Ricoh also seeks permission to publicly file a redacted version of its Memorandum in Support of its Motions *in Limine*, which contains Ricoh Confidential and Highly Confidential information, as well as the confidential information of third parties. A copy of Ricoh's Memorandum with proposed redactions highlighted is at TAB 1. Clean copies of the redacted pages of Ricoh's Memorandum are enclosed at TAB 2.

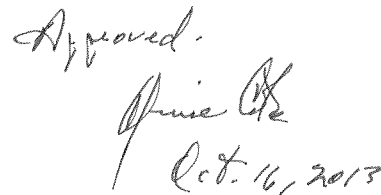
Further, after conferring, the parties have agreed that Exhibits 2-4 to the Pechenik Declaration (TABS 13-15) contain no confidential information of either party, and can be re-filed publicly.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,



David Eiseman



Encl.

cc: Robert Gunther, Jr.

Michael Summersgill